

**REQUIRED STATEMENT
TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY**

All Cases: Debtor(s) Zeid A Elaly
Case No. 21-03053 Chapter 7

All Cases: Moving Creditor U.S. Bank National Association Date Case Filed March 9, 2021

Nature of Relief Sought ☒ Lift Stay ☐ Annul Stay ☐ Other (describe) _____

Chapter 13: Date of Confirmation Hearing _____ or Date Plan Confirmed _____

Chapter 7: ☐ No-Asset Report filed on _____
☒ No-Asset Report not filed. Date of Creditor's Meeting: 04/09/21

1. Collateral

- a. ☐ Home
- b. ☒ Car 2015 Land Rover Range Rover, VIN#SALGS2TF0FA236048
- c. ☐ Other (describe)

2. Balance Owed as of March 23, 2021: \$61,338.95
Total of all other Liens against Collateral: \$0.00

3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the Debtor(s) post-petition:

4. Estimated Value of Collateral (must be supplied in all cases) \$39,225.00, clean retail value based upon the NADA Used Cars/Trucks guide dated March 23, 2021.

5. Default

- a. ☒ Pre-Petition Default
Number of months 19 Amount \$20,860.19
- b. ☐ Post-Petition Default
 - i. ☐ On direct payments to the moving creditor
Number of months _____ Amount \$ _____
 - ii. ☐ On payments to the Standing Chapter 13 Trustee
Number of months _____ Amount \$ _____

6. Other Allegations

- a. ☒ Lack of Adequate Protection 11 U.S.C. §362(d)(1)
 - i. ☐ No insurance
 - ii. ☐ Taxes unpaid Amount \$ _____
 - iii. ☒ Rapidly depreciating asset
 - iv. ☐ Other _____
- b. ☒ No Equity and Not Necessary for an Effective Reorganization 11 U.S.C. §362(d)(2)
- c. ☐ Other "Cause" 11 U.S.C. §362(d)(1)
 - i. ☐ Bad Faith (describe) _____
 - ii. ☐ Multiple filings
 - iii. ☐ Other (describe) _____

d. Debtor's Statement of Intention regarding the Collateral

i. ☐ Reaffirm ii. ☐ Redeem iii. ☐ Surrender iv. ☐ No Statement of Intention Filed

Date: April 7, 2021

Respectfully submitted,

/s/ Todd J. Ruchman

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Attorneys for Creditor

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